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September 21, 1993

MEMORANDUM TO THE COMMITTEE OF COUNSEL

Re: ASHRAE Ventilation Standard 62-1989

The Special Standing Project Committee charged with interpreting and revising ASHRAE Standard 62-1989, "Ventilation for Acceptable Indoor Air Quality" (SSPC 62), is considering a radical revision of that standard. Chairman Gene Tucker is supporting a revised standard that would recommend minimum ventilation rates for relatively "clean" environments with additional "default" rates to control specified sources of indoor air contamination.[1/]

Tucker's multiple ventilation rate approach already is generating substantial controversy within ASHRAE. Several Committee members are openly skeptical of Tucker's approach, suggesting that it would be unworkable from a practical standpoint. Others have argued that such a standard would mean increased liability exposure for both ASHRAE and individual design professionals.

Our consultants have been playing an active role in bringing these issues to the attention of appropriate ASHRAE officials and staff as well as the membership at large. We

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1/ There is likely to be a default ventilation rate prescribed for environmental tobacco smoke, but Tucker has not yet proposed specific numbers for ETS or any other indoor air substance. At this point, committee members have been unable to agree on the criteria on which the default values are to be based.

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also have been working closely with the Business Council on Indoor Air, which recently sent a legal memorandum to the ASHRAE Board of Directors discussing the potential liability risks presented by Tucker's proposed revision of the standard.

As a result, there is increasing evidence that the ASHRAE leadership, including the President, is worried about the direction in which Tucker would take the standard. ASHRAE officials, members and staff also have become concerned that the interests of the public health establishment and the EPA bureaucracy are overrepresented on the Committee, and that the interests of design engineers correspondingly are under-represented.

Growing concern about the composition and direction of the SSPC 62 Committee already has had favorable consequences. The members selected by ASHRAE to serve on the International Standards Organization's Technical Advisory Group on Building Environment Design (ISO TAG 205) are the most notable examples. The ISO TAG 205 Committee will act as the ISO coordinator for the development of a new international building design standard, which will include a ventilation component. The TAG 205 Committee also will be responsible for developing the U.S. position on the new international standard and related technical materials. Members of the TAG 205 Committee clearly are more representative of the design professionals and standard users who comprise the bulk of ASHRAE's membership than are the members of SSPC 62. In addition, five

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industry consultants or allies and three industry employees have been appointed to serve on the Committee. Milt Meckler recently won election as Chairman of TAG 205.

Notwithstanding the misgivings that have been expressed by many of his own Committee members, Chairman Tucker continues to insist that a revised standard will be published for public comment next year. Toward that end, he has called a special working meeting of the SSPC 62 Committee in early November. Even with the special meeting, however, it will be difficult for the Committee to have a revised standard based on the minimum and default ventilation rates advocated by Tucker ready for publication next year.

Whenever actually proposed, Tucker's radical approach seems unlikely to prevail. Even if (as we expect) Tucker is able to convince his committee to endorse the multiple ventilation rate approach he has been suggesting, we believe that that approach will be too controversial for the ASHRAE Board of Directors to adopt. We also believe that a standard based on Tucker's approach, if proposed by ASHRAE, would be rejected by ANSI based on lack of consensus. At that point, the ASHRAE leadership could well decide to disband the current Committee and convene a new committee with a more balanced membership.

Melinda Ledden Sidak

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